



ILLINOIS DEPARTMENT OF  
PUBLIC HEALTH

*A Healthier Today For A Better Tomorrow*

US EPA RECORDS CENTER REGION 5



473953

John R. Lumpkin, M.D., Director

MEMORANDUM

TO: Bernard J. Schorle, RPM  
U.S. EPA, Region V

FROM: Bruce C. Barrow *BCB*  
IDPH-Environmental Toxicology Section

RE: Pagel's Pit Landfill  
New Milford, Illinois  
Winnebago County

DATE: November 24, 1993

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Please find enclosed a memorandum regarding EPA reviewer comments on the draft public health assessment for above mentioned hazardous waste site. Responses to these comments are included in that memorandum. Thank you for these comments. Also enclosed is a public comment release draft of the public health assessment for the above mentioned hazardous waste site. A 30 day public comment period begins December 1, and ends December 30, 1993. A copy has been made available for review by the public at:

Rockford Public Library  
215 North Wyman Street  
Rockford, IL 61101

A final release of the public health assessment will be prepared following review of the written public comments. You will also receive a copy of this final release.



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John R. Lumpkin, M.D., Director

M E M O R A N D U M

TO: Bernard J. Schorle, Remedial Project Manager  
USEPA

FROM: Ken McCann, Mike Moomey, *KM*  
Environmental Toxicology

REASON: Response to comments for the Public Health Assessment  
for Pagel's Pit Landfill

DATE: September 23, 1993

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Below are my comments on the document mentioned above, which I received with your letter dated October 2, 1992. One general comment that I have, which is also brought out in the following, is that at this site, for the first operable unit, the report for the remedial investigation does not always say the same thing as the Record of Decision with regard to the conclusions drawn from the results of the study. That is one of the reasons that a second operable unit is underway at this time. I did not believe that I could tell the contractor for the Respondents what they should conclude from the results, but the U.S. Environmental Protection Agency's (USEPA's) position was that they did not prove some of the things they had concluded with regard to the influences of the adjacent Acme Solvent site. The Public Health Assessment has accepted the Respondent's position without reflecting that there is another position. Note that the conclusions regarding any problems presented by the site should be the same no matter what the sources of the contamination are.

Response: Changes have been made to reflect that the contractors interpretation of the results of the study are conjectural.

In the Summary:

- The site was placed on the National Priorities List on June 10, 1986.

Response: Corrected

- I prefer to refer to it as the Acme Solvent site.

Response: Suggestion incorporated

- Second paragraph. I do not believe the 1984-85 investigation was conducted for Acme. This probably should be "of."

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Response: Corrected

- I do not believe that the data shows that the area groundwater southwest of the landfill has been affected by the site. Possibly the problem here is connected with the definition of the site, which is commented on later.

Response: Since no definition of the site could be found, figure 2 from ROD, which only highlights the property of WRL, was used as a reference. The site was assumed to include only this property. This statement was made in reference to contamination of well G115. While this well appears to be southwest of the site it is actually referenced in the RI as being on the site. The correction has been made, however, we still don't have a true definition for the site. A map and definition of the site boundaries would be greatly appreciated.

In Part A starting on page 2:

- The site is in the south part of Winnebago County, but not the central part.

Response: Corrected

- The Record of Decision (ROD) Summary does not say that two coats of the sealer were used, at least not on page 2.

Response: Corrected

- As of the date of this ATSDR document, it is my understanding that the leachate is being piped to the wastewater treatment plant; at least, I have been told that the pipe was installed.

Response: We have no documentation stating that the leachate is being piped to Rockford. If documentation exists, we are not aware of it and would appreciate any updates.

- Paragraph 3. The citation for these statements must be given. I do not know that the operator has been cited for numerous violations. As far as I know, the ethanol plant was never operated; if this is the case, it could not have been the source of odors.

Response: This information was taken from IEPA's publication, "IEPA News, June 16, 1992," conversations with IEPA, and IEPA files for the site. Reference to the ethanol plant have been removed.

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- Paragraph 7. The remedial investigation and feasibility study (FS) were conducted for more reasons than this. This paragraph does not summarize the results very well.

Response: This paragraph has been reworked.

- Note that the June 28, 1991 ROD was for operable unit No. 1 at the site, and this did not cover the entire site. This must be included.

Response: Corrected

In Part C starting on page 4:

- I believe it should be "Caucasian."

Response: Corrected

- Land Use. The Supplemental Technical (not Remedial) Investigation for the Acme Solvent site was issued in February 1990, so it is not going on now. There was a ROD for the Acme Solvent site issued on December 1990.

Response: Statement deleted.

- Natural Resource. South of the site, the groundwater flow, I believe, is not from the west.

Response: Corrected

In Part A starting on page 9:

- Leachate, first paragraph. It should be mentioned that the extraction wells are gas extraction wells.

Response: Corrected

- Groundwater. This section (and others and the organization) must be redone. The site is not just the waste disposal area, but this and some of the surrounding area. The waste disposal area consists of approximately 47 acres (ROD Summary), not 100 acres (actually the site is about 90 acres in size). It is true that there are no wells into the groundwater directly below the waste disposal area. It is not true that there are no wells on the site into the groundwater. I also do not believe that one can say that leachate analysis tells us what the groundwater

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contamination is. The main focus of the RI activities was not off-site groundwater contamination.

Response: This section has been reworked based on my comment above regarding the site boundaries. Reference to the leachate analysis has been deleted.

In Part B starting on page 10:

- Groundwater, page 10. Not all available wells were sampled in Phase I; there are a lot of wells around the two sites. The results of the groundwater analyses during all four rounds showed some areas had changing levels of contamination, so I am not sure what "consistent" means.

Response: Consistent in terms of greatest overall contaminant concentrations or hot spots and types of contaminants detected.

- Groundwater, page 10. The contamination in the southeast corner of the site, which is just west of Lindenwood Road, has not been established to have come from the Acme Solvent site. This contamination is being studied further to see if it can be established where it comes from.

Response: Corrected

- Groundwater, page 10. Note that it says downgradient wells indicated contamination in the southeast corner.

Response: Corrected

- Groundwater, page 10. The Respondents' contractor concluded that a plume from WRL had overlapped a plume from the Acme Solvent site. This has not been completely accepted by USEPA, and I do not believe that the contractor's conclusion is found in the ROD.

Response: I have changed "it is believed" to " it has been suggested."

- Groundwater, page 11, last paragraph. This must be rewritten. This material will not be found in the ROD; it is based on the Respondents' contractor's conclusions, which have not been fully accepted. I totally reject the thought that background chloride levels were as high as 62 mg/l. The background level is more on the order of 20 mg/l, and on this basis, you have to draw different conclusions. This background is

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based on wells that could not have been contaminated by WRL. Consult the ROD before writing this section. I am not saying that you have to reject the contractor's conclusions, I am just saying that you should reflect that there are two opinions regarding the sources of the contamination. The other thing to consider is that the source of this contamination does not affect its health effects.

Response: I've changed the tone of the paragraph to reflect that this is only a theory. You are correct that this information does not affect the recommendations or purpose of this document.

- Surface Waters, page 12, eighth line. Typo.

Response: Corrected

In Tables 2 and 3. The source(s) of these items must be given. Not all things in the tables are in the units given; some things are not concentrations. Is an Adult RfD a concentration? What is on page 8 does not say this.

Response: We now have a reference dose media evaluation guide (RMEG) derived from the RfDs. The section and tables have been corrected.

In Table 3, why is dichloroethane listed twice?

Response: The isomers have been identified and the correction made.

In Part C starting on page 12.

- The method for the analysis of leachate for volatile organic compounds was changed after Round 3.

Response: Corrected

In Table 5, I do not understand "subsurface soils" with surface soils. Is this correct?

Response: No, this was a typo. Corrected.

In Part A starting on page 14.

- Air. Note that presently the gas extraction system does not cover the whole waste disposal area.

Response: Noted

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In Part B starting on page 14.

- Private Wells. This must be rewritten in light of what was mentioned above. You cannot say that the WRL contamination begins about midway through the landfill. It may extend further west than 900 feet to the west; no wells were there to check this.

Response: Corrected

- Private Wells, page 15. I believe that a ROD selected remedy is a little more than a recommendation.

Response: Reworded

In Part A starting on page 17.

Off-site monitoring wells down-gradient are mentioned. See previous comment about the site definition.

Response: Corrected

In Part C starting on page 18.

- In parts 1 and 3. Regarding elimination of the air pathway, see the above comment about gas extraction wells. Note that the failure of some components can shut down the system for limited periods.

Response: Has been clarified.

- In part 4. Leachate is also being pumped out of gas extraction wells. See the above comment about the pipeline for the leachate.

Response: Corrected

In Recommendations:

- Sampling of all monitoring wells in the vicinity of the two sites is a large and expensive undertaking, and it is probably not necessary, at least with regard to the problems associated with WRL. Sampling of a proper array of wells is certainly needed. This site probably has more wells associated with it than many comparable sites.

Response: The recommendation has been reworded.

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- Can some reason be given for sampling on-site surface soils that are eventually going to be covered by the cap?

Response: Sampling of on-site surface soils is necessary to evaluate past and potential present exposures to contaminated soil, even though the exposures may be short-term.

- Eventually it should be possible to shut down the gas extraction system and the leachate collection system. This is anticipated and Illinois regulations permit this. Eventually, gas generation will essentially cease and leachate production may decrease to a level where it is not necessary to remove it.

Response: Statement revised.

cc Fred Nika, Project Manager, IEPA  
Jim O'Brien, IEPA, Office of Chemical Safety  
Connie Sullinger, IEPA, Office of Chemical Safety  
IDPH, Rockford Region